

POLLUTION PREVENTION

LAST UPDATE – September 2016

E-100

IS THE OPERATOR PREVENTING UNAUTHORIZED DISCHARGE OF POLLUTANTS INTO OFFSHORE WATERS?

Authority: 30 CFR 250.107(a)
30 CFR. 250.132(b)
30 CFR.250.300
30 CFR.254.2(a)
30 CFR.254.5(a)
30 CFR.254.5(c)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Visually check the waters surrounding the facility when en route to, approaching, departing, or passing a facility by boat, helicopter, or fixed wing aircraft. Look for sheens, slicks, wastes, and other pollutants originating from the facility, risers, or pipelines. During the facility inspection, check the water for signs of any pollutants.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if:

The cause of the discharge has been identified and corrected prior to the inspection or observation, and no further pollution is occurring.

Issue a component shut-in (C) INC if:

A specific component has been determined to be the cause of pollution and the pollution is ongoing at the time of the inspection or observation.

Issue a facility shut-in (S) INC if:

More than one specific component has been determined to be the cause of the pollution and the pollution is ongoing at the time of the inspection or observation.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

E-101

IS THE LESSEE DISPOSING OF DRILL CUTTINGS, SAND, AND OTHER WELL SOLIDS AS APPROVED?

Authority: 30 CFR 250.300(b)(2)

Enforcement Action: CS

INSPECTION PROCEDURE:

1. Prior to the inspection, review the approved APD/APM to determine the approved method of disposal of cuttings, sand, and other well solids.
2. Visually inspect to verify that the cuttings, sand, and other well solids are being disposed of as approved.

IF NONCOMPLIANCE EXISTS:

Issue a component shut-in (C) INC for drilling/workover operation if the cuttings, sand, and other well solids are not being disposed of as approved and simultaneous operations are being conducted.

Issue a facility shut-in (S) INC if the cuttings, sand, and other well solids are not being disposed of as approved.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

E-102

IS THE FACILITY EQUIPPED WITH CURBS, GUTTERS, DRIP PANS, AND DRAINS NECESSARY TO COLLECT ALL CONTAMINANTS NOT AUTHORIZED FOR DISCHARGE?

Authority: 30 CFR 250.300(b)(4)

Enforcement Action: W/C/S

Note:

1. Curbs are to prevent fluids from spilling onto deck areas or into offshore waters.
2. Gutters are to prevent overflow and to channel fluids to a specified location without allowing spillage onto deck areas or into offshore waters.
3. Drip pans are placed under machinery that routinely experiences leakage. Drip pans need not be present when machinery subject to leakage is equipped with an adequate curb/gutter and drainage system. Drip pan and drains shall be installed to prevent overflow.

INSPECTION PROCEDURE:

1. Visually inspect the adequacy of all curbs, gutters, drip pans, and drains.
2. Verify that all deck areas where fluids would otherwise collect and stand are equipped with a drainage system and that all drains are free of blockage.
3. Visually check all drains for piping to a sump system.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when obvious maintenance is required on the curbs, gutters, drip pans, or drains to prevent future pollution incidents and pollution is not occurring.

Issue a component shut-in (C) INC:

1. For the component(s) that uses inadequate curbs, gutters, drip pans, or drains.
2. When the drain is damaged, or is not piped to a sump system.

Issue a facility shut-in (S) INC when the curbs, gutters and drains are deteriorated and unable to collect all contaminants not authorized for discharge, causing, or creating frequent pollution incidents and the curbs, gutters and drains cannot be corrected immediately.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

E-103

DOES THE SUMP SYSTEM AUTOMATICALLY MAINTAIN THE OIL AT A LEVEL SUFFICIENT TO PREVENT DISCHARGE OF OIL INTO OFFSHORE WATERS?

Authority: 30 CFR 250.300(b)(4)

Enforcement Action: W/C/S

INSPECTION PROCEDURE:

Inspect the sump system to verify that the level controls are operated automatically to prevent the discharge of pollutants into offshore waters.

Note: MODU's are not required to maintain an automatic sump tank since the rig has no place to automatically discharge the contaminants.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if the sump system is improperly maintained and pollution is not occurring.

Issue a component shut-in (C) INC for the component(s) that use the sump system when the level controls do not operate automatically to prevent the discharge of pollutants into offshore waters.

Issue a facility shut-in (S) INC when the sump system is not properly designed, operated and maintained to eliminate pollution incidents and the system cannot be corrected immediately.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

E-104

ARE ALL HYDROCARBON HANDLING EQUIPMENT FOR TESTING AND PRODUCTION DESIGNED, INSTALLED AND OPERATED TO PREVENT POLLUTION?

Authority: 30 CFR 250.300(b)(3)

Enforcement Action: W/C/S

30 CFR 250.841

INSPECTION PROCEDURE:

1. Inspect hydrocarbon handling equipment to verify that it is designed, installed and operated to prevent pollution. Maintenance or repairs which are necessary to prevent pollution of offshore waters shall be undertaken immediately.
2. Inspect hydrocarbon handling equipment that discharges produced water overboard and on final scrubbers in vent/flare systems to verify that they are operated.

IF NON COMPLIANCE EXISTS:

Issue a warning (W) INC if oil pumps and/or dump valves on hydrocarbon handling equipment that discharges produced water overboard and on final scrubbers in vent/flare systems are improperly maintained and pollution is not occurring.

Issue a component shut-in (C) INC when oil pumps and/or dump valves do not operate automatically to prevent the discharge of pollutants into offshore waters.

Issue a facility shut-in (S) INC when the hydrocarbon handling equipment is not properly designed, operated and maintained to prevent pollution incidents and the system cannot be corrected immediately

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility inspected.

E-105

ARE ALL GRAVITY DRAINS EQUIPPED WITH A WATER TRAP OR OTHER MEANS TO PREVENT GAS IN THE SUMP SYSTEM FROM ESCAPING THROUGH THE DRAINS?

Authority: 30 CFR 250.300(b)(4)

Enforcement Actions: W/C/S

INSPECTION PROCEDURES:

1. Identify the location of all gravity drains on the facility.
2. Inspect each gravity drain to verify that it has a water trap or other means "down-comer" to prevent gas from the sump system from escaping.

IF NON COMPLIANCE EXISTS:

Issue a warning (W) INC when the drain is equipped with a water trap, but the trap does not contain water.

Issue a component shut-in (C) INC for the component serviced by a drain when the drain is the only drain on the platform not equipped with a water trap or other means to prevent gas from the sump system from escaping.

Issue a facility shut-in (S) INC when two or more drains are not equipped with a water trap or other means to prevent gas from the sump system from escaping.

INSPECTION COUNT/INC COUNT:

Enter one item INC per facility.

E-106

ARE SUMP PILES NOT USED AS PROCESSING DEVICES?

Authority: 30 CFR 250.300(b)(4)

Enforcement Action: C

Note: Sump piles are intended to collect clear water from source water wells, treated-produced water, treated-produced sand, or liquids from drip pans and deck drains, and act as a final trap for hydrocarbon liquids in the event of equipment upsets. The use of the sump pile as a processing device increases the risk of pollution since there is no trap beyond the sump pile.

INSPECTION PROCEDURE:

Visually inspect sump system to verify that the sump pile is not being used as a processing device to treat or skim liquids.

IF NON COMPLIANCE EXISTS:

Issue a component shut-in (C) INC for the component feeding the sump pile if the sump pile is being used as a processing device.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC for each sump inspected.

E-107

IS THE LESSEE ADHERING TO THE PROHIBITION ON THE ADDITION OF PETROLEUM-BASED SUBSTANCES TO THE DRILLING MUD SYSTEM WITHOUT PRIOR APPROVAL OF THE DISTRICT MANAGER?

Authority: 30 CFR 250.300(b)(1)

Enforcement Action: S

INSPECTION PROCEDURE:

1. Prior to the inspection, review records to confirm if the District Manager has approved the use of petroleum-based substances in the drilling mud system.
2. Check the driller's report to confirm if petroleum-based substances have been added to the drilling mud system.
3. Check the drilling mud to confirm the presence or absence of petroleum-based substances.

IF NONCOMPLIANCE EXISTS:

Issue a facility shut-in (S) INC for drilling operations if petroleum-based substances have been added to the mud system without prior approval of the District Manager.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

E-108

IS THE LESSEE PREVENTING THE DISPOSAL OF EQUIPMENT, CABLES, CHAINS, CONTAINERS, OR OTHER MATERIALS INTO OFFSHORE WATERS?

Authority: 30 CFR 250.300(b)(6)

Enforcement Action: W/S

30 CFR 250.300(d)

INSPECTION PROCEDURE:

1. Visually observe the water around the facility during the inspection for objects which may be from the facility.
2. If an object is observed floating in the water, order the lessee to retrieve the object for identification and disposal.
3. During the inspection, observe the personnel employed on the facility for intentional or accidental disposal of any objects overboard.

IF NONCOMPLIANCE EXISTS:

Issue warning (W) INC if any objects are retrieved from the water and it is identified as belonging to the lessee unless noted on the facilities daily operations report and reported to the District Manager.

Issue a facility shut-in (S) INC when the operator is observed intentionally disposing of objects and materials overboard or when observed disposal can only be stopped by a total structure shut-in.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

INSPECTIONS AND REPORTS

NOTE: Reference to PINC's E-121 through E-132 can be found in 30 CFR 254.

E-120

ARE FACILITIES AND PIPELINES BEING INSPECTED FOR SIGNS OF POLLUTION, AND ARE RECORDS BEING MAINTAINED?

Authority: 30 CFR 250.132

Enforcement Action: W/S

30 CFR 250.301

30 CFR 250.1005(a)

INSPECTION PROCEDURE

Verify that:

1. Pollution inspections are being conducted at prescribed or approved intervals.
2. Weather conditions, e.g. fog, solid ice, that prevent pollution inspections are recorded in the inspection log.
3. Inspection records are being maintained for a two-year period at the facility or a nearby manned facility.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC when:

1. The pollution inspections are not being conducted as required.
2. The inspection records are not being maintained as required.

Issue a facility shut-in (S) INC if:

3. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance.

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility.

E-123

IS THE POLLUTION RESPONSE EQUIPMENT IDENTIFIED IN THE OIL SPILL RESPONSE PLAN LOCATED AT THE DESIGNATED SITE(S), TESTED, MAINTAINED, AND INSPECTED MONTHLY, AND ARE RECORDS BEING MAINTAINED?

Authority: 30 CFR 250.132

Enforcement Action: W/S

30 CFR 254.2(a)

30 CFR 254.5(a)

30 CFR 254.24(a)

30 CFR 254.40

30 CFR 254.42(e)

30 CFR 254.43

INSPECTION PROCEDURE

Inspect the storage sites designated in the Oil Spill Response Plan to verify that:

1. They contain the required response equipment.
2. The oil discharge response equipment is maintained for optimal performance.
3. Oil discharge response equipment is inspected on a monthly basis.
4. The oil discharge response equipment inspection and maintenance records are being maintained for minimum of two years.

IF NONCOMPLIANCE EXISTS

Issue a warning (W) INC when:

1. An onshore or offshore site does not contain the equipment listed in the Oil Spill Response Plan.
2. Records indicate the oil discharge response equipment is not inspected monthly.
3. The oil discharge response equipment is not being maintained for optimal performance.
4. Equipment inspection and maintenance records have not been maintained for two years

Issue a facility shut-in (S) INC if:

1. A warning (W) INC has been previously issued and the operator has not responded to BSEE requirements to correct the area of non-compliance

INSPECTION COUNT/INC COUNT:

Enter one item checked/ issue one INC per facility .

ARTIFICIAL ISLANDS

E-200

ON ARTIFICIAL ISLANDS, ARE ALL VESSELS CONTAINING HYDROCARBONS PLACED INSIDE AN IMPERVIOUS BERM OR OTHERWISE PROTECTED TO CONTAIN SPILLS?

Authority: 30 CFR 250.300(b)(5)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Visually inspect pits and berms to verify that all vessels containing hydrocarbons have been placed inside the berm.
2. Visually inspect impervious mat installation.
3. Check Operators records for consistency with approved plans.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if vessels containing hydrocarbons are not placed inside an impervious berm and pollution is not occurring.

Issue a facility shut-in (S) INC if vessels containing hydrocarbons are not placed inside an impervious berm and pollution is occurring.

INSPECTION COUNT/INC COUNT

Enter one item checked/ issue one INC for each site inspected.

E-201

ON ARTIFICIAL ISLANDS, IS DRAINAGE DIRECTED AWAY FROM THE DRILLING RIG TO A SUMP?

Authority: 30 CFR 250.300(b)(5)

Enforcement Action: W/S

INSPECTION PROCEDURE:

1. Verify that all drainage ditches are directed away from the drilling rig to an impervious sump by checking location of pits and sumps in relation to drainage areas.
2. Check Operators records and drilling plan to confirm the location of sumps.
3. Visually inspect drainage methods from rig areas.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if drainage ditches are not directed away from the drilling rig to an impervious sump and pollution is not occurring.

Issue a facility shut-in (C) INC if drainage ditches are not directed away from the drilling rig to an impervious sump and pollution is occurring.

INSPECTION COUNT/INC COUNT

Enter one item checked/ issue one INC for each site inspected

E-202

ON ARTIFICIAL ISLANDS, ARE DRAINS AND SUMPS CONSTRUCTED TO PREVENT SEEPAGE?

Authority: 30 CFR 250.300(b)(5)

Enforcement Action: W/S

INSPECTION PROCEDURE:

Visually inspect all drains and sumps to verify that they have been constructed in accordance with approved plans to prevent seepage.

IF NONCOMPLIANCE EXISTS:

Issue a warning (W) INC if a drain or a sump would not prevent seepage and pollution is not occurring.

Issue a facility shut-in (S) INC if a drain or a sump would not prevent seepage and pollution is occurring.

INSPECTION COUNT/INC COUNT

Enter one item checked/ issue one INC for each sump inspected.